

IN RE:	PAMELA JO CALHOUN,	:	CHAPTER 13
	AKA PAM J. CALHOUN, AKA	:	
	PAMELA J. CALHOUN,	:	
	Debtor	:	
		:	
	JACK N. ZAHAROPOULOS,	:	
	STANDING CHAPTER 13 TRUSTEE,	:	
	Movant	:	
		:	
	vs.	:	
		:	
	PAMELA JO CALHOUN,	:	
	AKA PAM J. CALHOUN, AKA	:	
	PAMELA J. CALHOUN,	:	
	Respondent	:	CASE NO. 1-21-bk-02637-HWV

AND NOW, this 14<sup>th</sup> day of January 14, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

- a. The Plan is underfunded relative to claims to be paid – 100% Plan. The Plan must pay at least \$26,560.82 to be properly funded based on claims filed as of January 13, 2025.

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

BY: /s/Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 14<sup>th</sup> day of January, 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire  
Imblum Law Offices, P.C.  
4615 Derry Street  
Harrisburg, PA 17111

/s/Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee